



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P. O. Box 6015
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(317) 232-8603
(800) 451-6027
www.state.in.us/idem

August 23, 2002

Mr. Jeffrey Kroyer
American Woodmark
P.O. Box 11
Gas City, Indiana 46933

Re: 053-15842-00058
First Amendment to
SSM 053-15248-00058

Dear Mr. Kroyer:

American Woodmark was issued a permit on April 29, 2002 for a woodworking and surface coating source. A letter requesting to add a new stack (#10) to vent the emissions from the curing stations EU 4-3 and EU 4-6 was received on July 9, 2002. Since there are no additional emissions, the permit is hereby amended as follows:

1. Two curing stations (EU 4-3 and EU 406) of the Finishing Line #4 were permitted to construct and operate in permit #053-15248-00058, issued April 29, 2002. No stack was designated to these two curing stations. American Woodmark has requested to add a stack (stack #10) to vent the emissions from these two curing stations due to the high temperature of the exhausts.

Since Finishing Line #4 is comprised of four (4) roller coaters and two (2) curing lamps, no particulate emissions are emitted from Finishing Line #4. Therefore, no compliance monitoring requirements are applicable to the new stack (stack #10). IDEM, OAQ has made the following changes to Conditions A.2 and D.1 to reflect the installation of this new stack:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary source is approved to construct and operate the following emission units and pollution control devices:

- (a) One (1) Finishing Line 4, to be constructed in 2002, with a maximum capacity of 4,000 pounds of wood components per hour, consisting of the following units:
 - (1) Four (4) roll coaters, identified as EU 4-1, EU 4-2, EU 4-4, and EU 4-5, each with a maximum capacity of four (4) gallons of UV-cured coating per hour; and
 - (2) Two (2) curing lamps, identified as EU 4-3 and EU 4-6, and **both exhausting through stack #10.**

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) Finishing Line 4, to be constructed in 2002, with a maximum capacity of 4,000 pounds of wood components per hour, consisting of the following units:
 - (1) Four (4) roll coaters, identified as EU 4-1, EU 4-2, EU 4-4, and EU 4-5, each with a maximum capacity of four (4) gallons of UV-cured coating per hour; and
 - (2) Two (2) curing lamps, identified as EU 4-3 and EU 4-6, **and both exhausting through stack #10.**
- (b) One (1) modification to the existing Finishing Line 2, originally constructed in 2000 and to be modified in 2002, with a maximum capacity of 4,000 pounds of wood components per hour, consisting of the following new units:
 - (1) Three (3) spray booths, identified as EU 2-12, EU 2-19, and EU 2-24, each with a maximum capacity of eight (8) gallons of coating per hour and one (1) gallon of cleaner per hour, all equipped with dry filters or water washes for particulate control, all vented to a common catalytic oxidizer that is also used to control emissions from the existing Finishing Line 1, originally constructed in 2000 and to be modified in 2002, with a total heat input capacity of nine (9) million British thermal units per hour;
 - (2) One (1) roll coater, identified as EU 2-14, with a maximum capacity of 0.5 gallons of coating per hour, with emissions vented back to spray booth EU 2-12;
 - (3) Three (3) ovens (hot water to air heat exchangers), identified as EU 2-16, EU 2-20, and EU 2-25, vented back to the spray booths EU 2-12, EU 2-19, and EU 2-24, respectively, each with cool down sections vented to the atmosphere; and

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

All other conditions of the permit shall remain unchanged and in effect. Please find attached a copy of the revised permit .

Pursuant to Contract No. A305-0-00-36, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Yu-Lien Chu, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7871 to speak directly to Ms. Chu. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Original Signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

ERG/YC

cc: File - Grant County
U.S. EPA, Region V
Grant County Health Department
Air Compliance Section Inspector - Gene Kelso
Compliance Data Section - Karen Nowak
Administrative and Development - Sara Cloe
Technical Support and Modeling - Michele Boner
TV File - 053-15248-00058



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PART 70 SIGNIFICANT SOURCE MODIFICATION OFFICE OF AIR QUALITY

**American Woodmark
5300 East Side Parkway
Gas City, Indiana 46933**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Significant Source Modification No.: 053-15248-00058	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: April 29, 2002
First Amendment No.: 053-15248-00058	Pages Affected: 4, 15
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: August 23, 2002

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Certification
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Semi-Annual Report

SECTION A

SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the emission units contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary woodworking and surface coating source.

Responsible Official:	John M. Schroer
Source Address:	5300 East Side Parkway, Gas City, Indiana 46933
Mailing Address:	P.O. Box 11, Gas City, Indiana 46933
General Source Phone Number:	(765) 677-1690
SIC Code:	2434
County Location:	Grant
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source under PSD Rules;

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source is approved to construct and operate the following emission units and pollution control devices:

- (a) One (1) Finishing Line 4, to be constructed in 2002, with a maximum capacity of 4,000 pounds of wood components per hour, consisting of the following units:
 - (1) Four (4) roll coaters, identified as EU 4-1, EU 4-2, EU 4-4, and EU 4-5, each with a maximum capacity of four (4) gallons of UV-cured coating per hour; and
 - (2) Two (2) curing lamps, identified as EU 4-3 and EU 4-6, and both exhausting through stack #10.
- (b) One (1) modification to the existing Finishing Line 2, originally constructed in 2000 and to be modified in 2002, with a maximum capacity of 4,000 pounds of wood components per hour, consisting of the following new units:
 - (1) Three (3) spray booths, identified as EU 2-12, EU 2-19, and EU 2-24, each with a maximum capacity of eight (8) gallons of coating per hour and one (1) gallon of cleaner per hour, all equipped with dry filters or water washes for particulate control, all vented to a common catalytic oxidizer that is also used to control emissions from the existing Finishing Line 1, originally constructed in 2000 and to be modified in 2002, with a total heat input capacity of nine (9) million British thermal units per hour;
 - (2) One (1) roll coater, identified as EU 2-14, with a maximum capacity of 0.5 gallons of coating per hour, with emissions vented back to spray booth EU 2-12;
 - (3) Three (3) ovens (hot water to air heat exchangers), identified as EU 2-16, EU 2-20, and EU 2-25, vented back to the spray booths EU 2-12, EU 2-19, and EU 2-24, respectively, each with cool down sections vented to the atmosphere; and

- (4) Woodworking operations associated with Finishing Line 2, with a maximum capacity of 4, 000 pounds of wood cabinet components per hour, all vent to baghouse BH-3 for particulate control.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22); and
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONSTRUCTION CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

B.3 Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.4 Significant Source Modification [326 IAC 2-7-10.5(h)]

This document shall also become the approval to operate pursuant to 326 IAC 2-7-10.5(h) when, prior to start of operation, the following requirements are met:

- (a) The attached affidavit of construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section, verifying that the emission units were constructed as proposed in the application. The emissions units covered in the Significant Source Modification approval may begin operating on the date the affidavit of construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emissions units differs from the construction proposed in the application, the source may not begin operation until the source modification has been revised pursuant to 326 IAC 2-7-11 or 326 IAC 2-7-12 and an Operation Permit Validation Letter is issued.
- (c) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (d) The Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.
- (e) In the event that the Part 70 application is being processed at the same time as this application, the following additional procedures shall be followed for obtaining the right to operate:
 - (1) If the Part 70 draft permit has not gone on public notice, then the change/addition covered by the Significant Source Modification will be included in the Part 70 draft.
 - (2) If the Part 70 permit has gone through final EPA proposal and would be issued ahead of the Significant Source Modification, the Significant Source Modification will go through a concurrent 45-day EPA review. Then the Significant Source Modification will be incorporated into the final Part 70 permit at the time of issuance.
 - (3) If the Part 70 permit has gone through public notice, but has not gone through final EPA review and would be issued after the Significant Source Modification is issued, then the Modification would be added to the proposed Part 70 permit, and the Title V permit will be issued after EPA's review.

B.5 NESHAP Reporting Requirement Part 63.807

Pursuant to the National Emission Standards for Hazardous Air Pollutants (NESHAP), Part 63, Subpart JJ, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

- (a) Initial Notification per 40 CFR 63.9(b) through (d); and
- (b) Notification of compliance status as required by 40 CFR 63.9(h).

Reports are to be sent to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, IN 46206-6015

The application and enforcement of these standards have been delegated to the IDEM, OAQ. The requirements of 40 CFR Part 63 are also federally enforceable.

SECTION C

GENERAL OPERATION CONDITIONS

C.1 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

C.2 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) when operation begins, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request [326 IAC 2-7-11(c)(3)].

C.4 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using good engineering practices (GEP) pursuant to 326 IAC 1-7-3.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6][326 IAC 2-1.1-11]

- (a) Compliance testing on new emission units shall be conducted within 60 days after achieving the maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this approval, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this approval, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

If required by Section D, all monitoring and record keeping requirements shall be implemented when operation begins. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

C.11 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of the fan amperage, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.12 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

-
- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
 - (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
 - (c) The Permittee is not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

- (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
- (3) An automatic measurement was taken when the process was not operating.
- (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was, at the time being, properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967
 - (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) any steps taken to mitigate the emissions; and
- (C) corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.15 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required, shall be implemented within ninety (90) days of permit issuance.

C.16 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) The reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) Finishing Line 4, to be constructed in 2002, with a maximum capacity of 4,000 pounds of wood components per hour, consisting of the following units:
 - (1) Four (4) roll coaters, identified as EU 4-1, EU 4-2, EU 4-4, and EU 4-5, each with a maximum capacity of four (4) gallons of UV-cured coating per hour; and
 - (2) Two (2) curing lamps, identified as EU 4-3 and EU 4-6, and both exhausting through stack #10.
- (b) One (1) modification to the existing Finishing Line 2, originally constructed in 2000 and to be modified in 2002, with a maximum capacity of 4,000 pounds of wood components per hour, consisting of the following new units:
 - (1) Three (3) spray booths, identified as EU 2-12, EU 2-19, and EU 2-24, each with a maximum capacity of eight (8) gallons of coating per hour and one (1) gallon of cleaner per hour, all equipped with dry filters or water washes for particulate control, all vented to a common catalytic oxidizer that is also used to control emissions from the existing Finishing Line 1, originally constructed in 2000 and to be modified in 2002, with a total heat input capacity of nine (9) million British thermal units per hour;
 - (2) One (1) roll coater, identified as EU 2-14, with a maximum capacity of 0.5 gallons of coating per hour, with emissions vented back to spray booth EU 2-12;
 - (3) Three (3) ovens (hot water to air heat exchangers), identified as EU 2-16, EU 2-20, and EU 2-25, vented back to the spray booths EU 2-12, EU 2-19, and EU 2-24, respectively, each with cool down sections vented to the atmosphere; and

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.2 VOC PSD Minor Limit [326 IAC 2-2][40 CFR 52.21]

The VOC input to the entire source shall be limited to less than one thousand seven hundred and seventeen (1,717) tons per twelve (12) consecutive month period including coatings, dilution solvents, and cleaning solvents. The following equation shall be used to calculate the total VOC input:

$$\text{VOC input (ton/year)} = \text{VOC input (ton) to Finishing Line 1} + \text{VOC input (ton) to Finishing Line 2} + (6.9 * \text{VOC input (ton) to Finishing Line 3}) + (6.9 * \text{VOC input (ton) to Finishing Line 4}) \leq 1,717 \text{ ton/yr}$$

This VOC input limit is equivalent to VOC emissions of two hundred forty-nine (249) tons per year from the four finishing lines and is structured such that, no matter what combination of finishing lines the 1,717 tons of VOC is inputted to, there is no possible way for emissions from the four finishing lines to exceed 249 tons per year. This limit is structured such that when including emissions from combustion, the source total VOC emissions are less than two hundred fifty (250) tons per year. Therefore the source and the modification are both not subject to 326 IAC 2-2 (Prevention of Significant Deterioration).

D.1.3 PM PSD Minor Limit [326 IAC 2-2][40 CFR 52.21]

The dry filters of EU 2-12 water washes of EU 2-19 and EU 2-24 for particulate control shall be in operation at all times that the spray booths are in operation. This limitation is structured such that when including emissions from the woodworking operation in Section D.2, the PM and PM₁₀ emissions from the whole source shall remain below two hundred and fifty (250) tons per year. Therefore, the entire source and the modification are both not subject to 326 IAC 2-2 (Prevention of Significant Deterioration).

D.1.4 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart JJ.

D.1.5 Wood Furniture Manufacturing Operations NESHAP [326 IAC 20-14-1] [40 CFR Part 63, Subpart JJ]

(a) The wood furniture manufacturing operations are subject to 40 CFR Part 63, Subpart JJ, which is incorporated by reference as 326 IAC 20-14-1, and shall be in compliance upon startup. A copy of this rule is attached.

(b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:

(1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:

(A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of eight-tenths (0.8) of a pound VHAP per pound solids; or

(B) Use compliant finishing materials in which all stains have a maximum VHAP content of (1.0) pound VHAP per pound solid, as applied.

Use compliant finishing materials in which all washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of eight-tenths (0.8) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or

- (C) Use a control device to limit emissions to eight-tenths (0.8) of a pound VHAP per pound solids; or
 - (D) Use a combination of (A), (B), and (C).
- (2) Limit VHAP emissions contact adhesives as follows:
- (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed two-tenths (0.2) of a pound VHAP per pound solids.
 - (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed two-tenths (0.2) of a pound VHAP per pound solids.
 - (C) Use a control device to limit emissions to two-tenths (0.2) of a pound VHAP per pound solids.
- (3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

D.1.6 Work Practice Standards [326 IAC 20-14-1] [40 CFR 63.803]

The owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

- (a) Operator training course.
- (b) Leak inspection and maintenance plan.
- (c) Cleaning and washoff solvent accounting system.
- (d) Chemical composition of cleaning and washoff solvents.
- (e) Spray booth cleaning.
- (f) Storage requirements.
- (g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
- (h) Line cleaning.
- (i) Gun cleaning.
- (j) Washoff operations.
- (k) Formulation assessment plan for finishing operations.

D.1.7 Particulate Matter (PM) [326 IAC 6-3-2]

The PM from the surface coating facilities shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.8 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the facilities and their control devices.

Compliance Determination Requirements

D.1.9 Catalytic Oxidizer

- (a) The catalytic oxidizer, with a natural gas heat input of nine (9) MMBtu/hr, shall operate at all times when Finishing Line 1 and Finishing Line 2 are in operation in order to comply with 40 CFR 63, Subpart JJ and Condition D.1.2.
- (b) The catalytic oxidizer shall operate with an overall efficiency of not less than 85.5% at all times when Finishing Line 1 and Finishing Line 2 are in operation. This overall efficiency is necessary to ensure compliance with Condition D.1.2.

D.1.10 Particulate Matter

The dry filters for particulate control on spray booth EU 2-12 shall be in operation at all times that the spray booth is in operation in order to comply with Condition D.1.3 and D.1.7

D.1.11 Water Wash System

The water wash system for particulate control on spray booths EU 2-19 and EU 2-24 shall be in operation at all times that the spray booths are in operation in order to comply with Conditions D.1.3 and D.1.7.

D.1.12 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

- (a) Pursuant to 40 CFR 60.675(c) and 40 CFR 60.11, VOC and efficiency testing on the catalytic oxidizer controlling emissions from Finishing Line 1 and Finishing Line 2 to determine compliance with Conditions D.1.2 and D.1.9 shall be conducted within 60 days after achieving the maximum production rate, but no later than 180 days after initial start-up of the reconstructed Finishing Line 2. These tests shall be performed according to 326 IAC 3-6 (Source Sampling Procedures) utilizing U.S. EPA Methods 5 and 9 (40 CFR Part 60, Appendix A) or other methods as approved by the Commissioner.
- (b) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing on Finishing Line 2 must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.
- (c) Within 60 days after achieving the maximum production rate, but no later than 180 days after initial start-up, the Permittee shall remove the catalyst from the catalytic oxidizer and have the vendor conduct a catalyst activity analysis. This test shall be repeated every twenty-four (24) months after the previous test. This test shall also be repeated each time a performance test is run on the thermal oxidizer. The catalyst shall be replaced each time that the vendor recommends replacement and each time that the oxidizer is found to not be achieving its required minimum efficiency due to catalyst failure.

D.1.13 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. The following equation shall be used to determine compliance with the limit contained Condition D.1.2:

$$\text{VOC input (ton/year)} = \text{VOC input (ton) to Finishing Line 1} + \text{VOC input (ton) to Finishing Line 2} + (6.9 * \text{VOC input (ton) to Finishing Line 3}) + (6.9 * \text{VOC input (ton) to Finishing Line 4}) \leq 1,717 \text{ ton/yr}$$

D.1.14 VOC Emissions

Compliance with Condition D.1.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the month.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.15 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters on EU 2-12. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) Daily inspections shall be performed to verify the placement, integrity and operation of the water wash system on EU 2-19 and EU 2-24. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (c) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.1.16 Catalytic Oxidizer

The catalytic oxidizer shall maintain a minimum zone operating temperature of 800°F or a minimum zone operating temperature and fan amperage as determined from the most recent compliant stack test, as approved by IDEM. The temperature shall correlate to at least an overall VOC control efficiency of 85.5%. The oxidizer shall capture at least 90% and catalytically oxidize at a minimum of 95% of the VOC from Finishing Line 1 and Finishing Line 2.

D.1.17 Parametric Monitoring

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the catalytic oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test.
- (b) The duct pressure or fan amperage shall be observed at least once per week when the catalytic oxidizer is in operation. This pressure or amperage shall be maintained with a range as established in most recent compliant stack test.
- (c) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the reading is outside the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.1.18 Catalyst Replacement

The catalysts shall be replaced each time that the results of the vendor catalyst activity analysis required in Condition D.1.12(c), indicates replacement is necessary. The catalyst shall also be replaced when the oxidizer is found to not be achieving its required minimum efficiency due to catalyst failure.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.19 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (8) below. Records maintained for (1) through (8) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.2.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents. Note: The VOC input to the uncontrolled lines shall be multiplied by a factor of 6.9 ($1/1 - \text{control efficiency} = 6.9$) in order to equate the uncontrolled solvent throughput to an equivalent controlled solvent throughput;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month for each finishing line;
 - (5) The total VOC usage for the month using the following equation: $\text{VOC input (ton/mo)} = \text{VOC input (ton/mo) to Finishing Line 1} + \text{VOC input (ton/mo) to Finishing Line 2} + (6.9 * \text{VOC input (ton/mo) to Finishing Line 3}) + (6.9 * \text{VOC input (ton/mo) to Finishing Line 4})$.
 - (6) The weight of VOCs emitted for each compliance period;
 - (7) The continuous temperature records for the catalytic oxidizer and the temperature used to demonstrate compliance during the most recent compliance stack test; and
 - (8) Weekly records of the duct pressure or fan amperage.
- (b) To document compliance with Condition D.1.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.1.5.
 - (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
 - (2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
 - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.
 - (4) The VHAP content in weight percent of each thinner used.
 - (5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (c) To document compliance with Condition D.1.6, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.

- (d) To document compliance with Condition D.1.12(c), the Permittee shall maintain records of the dates and results of catalyst activity tests.
- (e) To document compliance with Condition D.1.15, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (f) To document compliance with Condition D.1.18, the Permittee shall maintain a log of the dates of catalyst replacement.
- (g) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.20 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) An Initial Compliance Report to document compliance with Condition D.1.4 and the Certification form, shall be submitted within sixty (60) days following startup. The Initial Compliance Report must include data from the entire month that the compliance date falls.
- (c) Pursuant to 40 CFR 63, Subpart JJ, a semi-annual Continuous Compliance Report to document compliance with Condition D.1.5 and the Certification form, shall be submitted within thirty (30) days after the end of the six (6) months being reported.
 - (1) For the first year following the compliance date, the six (6) month period shall begin on the first day of the month after which the operation commences.
 - (2) Following the first year of reporting, the semi-annual Continuous Compliance Report shall be submitted on a calendar year basis with the reporting periods ending June 30 and December 31.
- (d) For use of the catalytic oxidizer to comply, the excess emissions and continuous monitoring system performance report and summary report required in 40 CFR 63.807(d).
- (e) The reports required in (b) and (c) of this condition shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (b) One (1) modification to the existing Finishing Line 2, originally constructed in 2000 and to be modified in 2002, with a maximum capacity of 4,000 pounds of wood components per hour, consisting of the following new units:
 - (4) Woodworking operations associated with Finishing Line 2, with a maximum capacity of 4,000 pounds of wood cabinet components per hour, all vent to baghouse BH-3 for particulate control.-1.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) from the woodworking operations associated with Finishing Line 2 shall be limited to less than 6.52 pounds per hour when operating at a process weight rate of 4,000 pounds per hour. This limit was calculated using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

D.2.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

BH-3 shall have a flow rate of less than 45,000 acfm, and an emission rate of less than 0.01 grains per dry standard cubic feet. These limits will result in a PM and PM₁₀ emission limit of less than 16.89 tons per year (3.86 pounds per hour) from the new woodworking operations associated with Finishing Line 2. These limitations are structured such that when including the emissions from the spray booths in Section D.1, the PM and PM₁₀ emissions from the entire source shall remain below two hundred and fifty (250) tons per year. Therefore, the entire source and the modification are both not subject to 326 IAC 2-2 (Prevention of Significant Deterioration).

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.2.4 Particulate Matter (PM)

In order to comply with Conditions D.2.1 and D.2.2, the baghouse for PM control shall be in operation and control emissions from the woodworking operations at all times that the woodworking operations are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.5 Visible Emissions Notations

- (a) Daily visible emission notations of the woodworking stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.2.6 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.2.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhaust.
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 SOURCE MODIFICATION CERTIFICATION

Source Name: American Woodmark
Source Address: 5300 East Side Parkway, Indiana 46933
Mailing Address: P.O. Box 11, Gas City, Indiana 46933
Source Modification No.: 053-15248-00058

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this approval.

Please check what document is being certified:

- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

Part 70 Source Modification Quarterly Report

Source Name: American Woodmark
Source Address: 5300 East Side Parkway, Indiana 46933
Mailing Address: P.O. Box 11, Gas City, Indiana 46933
Source Modification No.: 053-15248-00058
Facility: Finishing Line 1, 2, 3, 4, combined
Parameter: VOC input
Limit: Less than 1,717 tons per year
VOC input (ton/year) = VOC input (ton) to Finishing Line 1 + VOC input (ton) to Finishing Line 2 + (6.9 * VOC input (ton) to Finishing Line 3) + (6.9 * VOC input (ton) to Finishing Line 4) \leq 1,717 ton/yr

YEAR: _____

Month	Finishing Line	Column 1	Column 2	Column 1 + Column 2
		This Month	Previous 11 Months	12 Month Total
Month 1	Finishing Line 1			
	Finishing Line 2			
	Finishing Line 3			
	Finishing Line 4			
	Total*			
Month 2	Finishing Line 1			
	Finishing Line 2			
	Finishing Line 3			
	Finishing Line 4			
	Total*			
Month 3	Finishing Line 1			
	Finishing Line 2			
	Finishing Line 3			
	Finishing Line 4			
	Total*			

* Total = VOC input (ton) to Finishing Line 1 + VOC input (ton) to Finishing Line 2 + (6.9 * VOC input (ton) to Finishing Line 3) + (6.9 * VOC input (ton) to Finishing Line 4)

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

PART 70 SOURCE MODIFICATION OPERATING PERMIT

Semi-Annual Report

VOC and VHAP usage - Wood Furniture NESHAP

Source Name: American Woodmark
Source Address: 5300 East Side Parkway, Gas City, Indiana 46933
Mailing Address: P.O. Box 11, Gas City, Indiana 46933
Source Modification No.: 053-15248-00058
Facility: Surface Coating
Parameter: VOC and VHAPs - NESHAP
Limit:
(1) Finishing operations - 1.0 lb VHAP/lb Solids
(2) Thinners used for on-site formulation of washcoats, basecoats and enamels - 3% VHAP content by weight
(3) All other thinner mixtures - 10% VHAP content by weight
(4) Foam adhesives meeting the upholstered seating flammability requirements - 1.8 lb VHAP/lb Solids
(5) All other contact adhesives - 1.0 lb VHAP/lb Solids
(6) Strippable spray booth material - 0.8 pounds VOC per pound solids

YEAR: _____

Month	Finishing Operations (lb VHAP/lb Solid)	Thinners used for on-site formulation (% by weight)	All other thinner mixtures (% by weight)	Foam adhesives (upholstered) (lb VHAP/lb Solid)	Contact adhesives (lb VHAP/lb Solid)	Strippable spray booth material (lb VOC/lb Solid)
1						
2						
3						
4						
5						
6						

9 No deviation occurred in this six month period.

9 Deviation/s occurred in this six month period.

Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report